



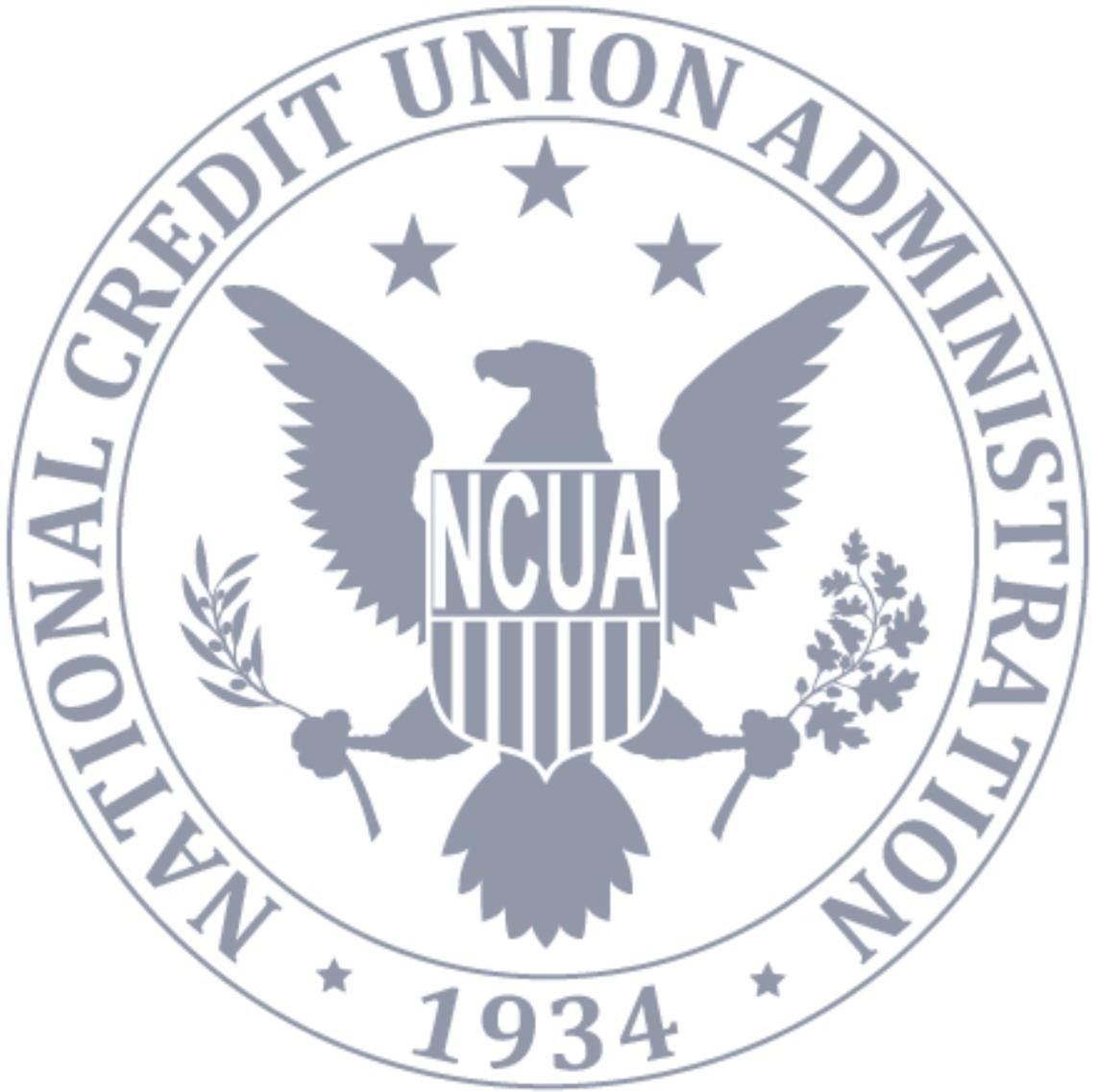
**NCUA**  
National Credit Union Administration

# 2021–2022 Plain Writing Act Compliance Report

---

April 2022

[This page intentionally left blank]





## Plain Writing Act Compliance Report

---

### Table of Contents

---

- Introduction..... 2
- Initial Requirements ..... 2
- Plain Writing Officer and Infrastructure..... 3
- Resources ..... 3
- Plain Writing Compliance ..... 4
- Training..... 11





## Introduction

---

The [Plain Writing Act of 2010](#) requires “clear Government communication that the public can understand and use.” As part of its mission to protect the system of cooperative credit and its member-owners through effective chartering, supervision, regulation, and insurance, the National Credit Union Administration (NCUA) strives to write documents that are “clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience,” as required by the Act.

Compliance with the Act is a priority among the NCUA’s leadership, managers, and staff, and the agency works continuously to improve its performance in that regard. This report is provided for the 2021–2022 compliance period, completing the eleventh annual review of the NCUA’s compliance with the Act.

## Initial Requirements

---

The Plain Writing Act mandates six core actions and four additional requirements agencies must fulfill to maintain compliance with the law:

### Core Actions

- Designate one or more senior officials within the agency to oversee the agency’s implementation of the Act;
- Communicate the requirements of the Act to agency employees;
- Train agency employees in plain writing;
- Establish a process for overseeing the agency’s ongoing compliance with the Act’s requirements;
- Create and maintain a plain writing section on the agency’s website that is accessible from the homepage of the agency’s website; and
- Designate one or more points-of-contact to receive and respond to public input on the agency’s implementation of the Act and the required reports.

### Additional Requirements

- The agency’s plain writing website must inform the public of its compliance with the Act’s requirements. It must also provide a mechanism for the agency to



receive and respond to public input on the agency's implementation of the Act and required reports.

- Each agency will use plain writing in every document that it issues or substantially revises.
- Each agency head will publish on the plain writing section of the agency's website a report that describes the agency's Act compliance plan.
- Each agency head will publish on the plain writing section of the agency's website an annual report on agency compliance with the law's requirements.

## Plain Writing Officer and Infrastructure

---

The NCUA's Director of the Office of External Affairs and Communications (OEAC) is responsible for implementing the Act and serving as agency point-of-contact to receive and respond to public input. Questions or comments concerning the agency's plain writing efforts may be sent to [plainwriting@ncua.gov](mailto:plainwriting@ncua.gov).

The NCUA periodically educates staff about plain writing requirements and produces public documents that are easier for audiences to understand and use. Examples of those efforts are listed in the [Plain Writing Compliance](#) and [Training](#) sections.

The NCUA's [plain writing webpage](#) meets the Act's requirements for accessibility to agency implementation and compliance reports, and includes a link to the [plainlanguage.gov](http://plainlanguage.gov) website. The webpage also provides an email address for the public to send comments.

## Resources

---

- Chapter two of the NCUA's *Communications Manual* provides staff with guidance on following plain writing principles.
- The agency's Office of Human Resources (OHR) provides a two-day *Writing for Examiners* course as well as a *Writing for Office Staff* course. Upon request, OHR arranges writing classes tailored to meet the needs of agency offices.
- Agency staff use templates for memorandums, reports, and correspondence that incorporate plain writing principles and help ensure consistency and clarity in agency communications.



## Plain Writing Compliance

---

This section of the 2021–2022 Plain Writing Act Compliance Report details the actions of individual offices at the NCUA to ensure compliance with the Plain Writing Act.

The office of Credit Union Resources and Expansion (CURE) continues to create public informational and educational materials, as well as industry training products, that incorporate the principles of plain writing, such as fact sheets, guides, and related resources; publicly facing reports to Congress; and webinars, videos, and online training courses posted on the agency’s [Learning And Managing Performance](#) service. CURE’s internal and external communications undergo an editorial process that includes review for compliance with plain writing standards, and staff are reminded of the importance of plain writing in development of work products. Examples of external materials, including annual reports, guidelines, webinars, and other events produced by CURE that incorporate plain writing principles include:

- The 2021 [Community Development Revolving Loan Fund Congressional Report](#);
- [The 2021 Community Development Revolving Loan Fund Grant Round Application Guidelines](#);
- The [Preserving Minority Depository Institutions Annual Report to Congress](#);
- A [Community Development Financial Institutions Fund Small Dollar Loan Program webinar](#) co-hosted with U.S. Department of the Treasury Community Development Financial Institutions Fund staff;
- A [Critical Security Controls and Cyber Hygiene webinar](#) co-hosted with Department of Homeland Security Cybersecurity and Infrastructure Security Agency staff;
- [An Overview of the Emergency Capital Investment Program webinar](#) co-hosted with other federal financial regulators;
- A [Pandemic Related Credit Risks for Credit Unions webinar](#);
- A [Bank Secrecy Act Update webinar](#);
- A [webinar on Understanding the Automated Cybersecurity Evaluation Toolbox](#); and
- Three regional roundtables for Minority Depository Institution credit unions that provided an overview of financial trends and supervisory priorities.

The Office of Examination and Insurance (E&I) emphasizes plain language in the development of staff manuals, guidance, and public-facing communications. Since



2013, the office has two dedicated Technical Editors who provide guidance and direction on adhering to the Plain Writing Act, and they collaboratively compile key public-facing documents. The Technical Editors review and edit all releases for adherence to plain writing principles. The editors work with staff and other agency working groups to update and electronically publish manuals and guides in an interactive format.

An example of efforts using plain writing principles is the [Examiner's Guide](#), a collection of more than 400 pages of content. Staff and Technical Editors update this content on an ongoing basis to provide accurate guidance to examination staff, while adhering to plain language standards. Recent major efforts to increase the clarity and useability of the [Examiner's Guide](#) include a major push to standardize and clarify examination procedures with a set format that includes easy-to-follow steps for examiners of all experience levels. The office also emphasizes plain language as it replaces and rewrites essential staff and industry manuals and guides, such as the internal examination policies contained in the [National Supervision Policy Manual](#), which was released in four versions with updated content this past year.

The Office of Business Innovation (OBI) upholds plain language standards for both internal and public-facing products. The office routinely reviews internal and external web-based postings to ensure consistent use of plain writing guidelines and agency templates. Specifically, OBI regularly reviews and revises language, as necessary, to ensure memos, documents, and presentations comply with the agency's *Communications Manual* and templates. OBI reinforces plain writing principles with staff on detail to the office by teaching them where to find standard agency-approved templates and carefully editing products to ensure adherence to plain writing guidelines.

The Office of the Chief Economist (OCE) ensures all products are well-written, understandable, and follow Plain Writing Act principles. The office's general practice is to ensure the Chief Economist or another senior staff member reviews and provides necessary edits to written products before they are widely disseminated. While such reviews ensure that errors are identified, a primary review objective is ensuring economic concepts are clearly explained and key statistical findings are well articulated. Though all OCE staff have years of experience developing strong written products, reviews remain an essential part of the office's typical workflow.

The Office of the Chief Financial Officer (OCFO) used plain writing principles and quality control in the following documents: Board Action Memorandums and related documents for the agency's *2021 Midsession Budget*, the [2022–2023 Budget Justification](#), the [NCUA Strategic Plan 2022–2026](#), the [2022 Annual Performance Plan](#), and the [2021 Annual Report](#). In management's review process of public-facing documents, plain writing attributes are communicated to staff who author documents. This serves as a form of continuous feedback and on-the-job training. Materials for external parties are reviewed under a normal supervisory review process with the final



sign-off by the Director, Deputy Chief Financial Officer, or Chief Financial Officer, depending upon the audience, and the final review conducted by an individual with strong plain writing and communication skills.

The Office of the Chief Information Officer (OCIO) understands the value of a plain-language approach and supports the improvement of communication from the government. The Director or Deputy Directors review materials for compliance with Plain Writing Act prior to dissemination, including reports, memorandums, alert notifications, and data requests.

Plain writing principles are integral to the Office of Consumer Financial Protection's (OCFP) preparation of written communications, scripts, and visual content for videos, public broadcasts, and webinars. To support this objective, throughout the year, staff receive consistent feedback on their written work from their direct supervisors to ensure they use plain language. Some examples of the office's products include:

- **Consumer Education Resources:** OCFP is committed to producing written information the public can understand and use. To that end, the office develops consumer educational resources, including content on the agency's consumer website, [MyCreditUnion.gov](https://mycreditunion.gov), that is clear, concise, well-organized, and consistent with plain writing best practices. Prior to publication, these resources go through a rigorous review process to ensure that the style and tone are appropriate for the intended audience, free of grammatical and spelling errors, and conform to the Plain Writing Act. Examples from this past year on [MyCreditUnion.gov](https://mycreditunion.gov) include the following page updates:
  - [Holiday Shopping Tips](#);
  - [Establishing Financial Goals](#); and
  - [Tips on Avoiding Overdraft Fees](#).
- **Consumer Assistance Center Communications:** OCFP revises consumer call-center scripts to reflect clear and conversational language with consumers. Staff also revised several templates used in communicating with credit unions and consumers about the consumer complaint process.
- **Videos and Webinars:** OCFP uses plain writing principles to develop scripts and visual content for all videos, public broadcasts, and webinars. Examples include:
  - A [2021 Consumer Compliance and Fair Lending Regulatory Update](#) webinar;
  - A [2021 Fair Lending Interagency Webinar](#) with the NCUA and other federal financial regulators;



- 2021 [Account Access and Financial Education for Youth Participating in Employment Programs](#) webinar co-hosted with the Federal Deposit Insurance Corporation;
- An [Account Access and Financial Education for Youth Participating in Employment Programs \(Part II\)](#) webinar co-hosted with the Federal Deposit Insurance Corporation;
- A [Financial Readiness and Fraud Prevention Resources for Servicemembers, Veterans and their Families](#) webinar;
- A [Pathways to Safe and Affordable Account Access for Consumers](#) webinar;
- A [Understanding Bias in Home Appraisals and the Racial Homeownership Gap](#) webinar;
- A [Consumer Tips: Act Fast to Protect your Money](#) video;
- A [National Consumer Protection Week](#) video; and
- A [Financial Capability Month Promotional](#) video.
- **Consumer Compliance Resources and Fair Lending Exam Materials:** OCFP uses plain language principles to inform federal credit unions about new or amended laws and regulations and resulting compliance requirements. OCFP also used plain language to prepare eleven Regulatory Alerts and plain language principles in written fair lending examination reports and supervision contact reports issued to credit unions.
- **Educational Materials and Presentations:** OCFP uses plain language principles to develop numerous educational materials for agency staff. Examples include:
  - Planning and presenting online training sessions for agency examination staff on both the 2021 and 2022 consumer compliance examination procedures found in the [NCUA Consumer Financial Protection Guide](#);
  - Presenting quarterly training on timely consumer compliance topics at the Consumer Compliance Subject Matter Expert Working Group; and
  - The 2021 and 2022 Consumer Complaint Quarterly Trends reports.

To ensure compliance with the Plain Writing Act of 2010, the Director of the Office of Continuity and Security Management (OCSM) reviews all formal correspondence and written reports prior to dissemination for compliance with the Plain Writing Act, including reports of findings, memorandums, after action reports, alert notifications, and data requests. All formal documentation is routinely reviewed by multiple staff from different areas of expertise to ensure clarity of content. The multi-staff level review serves as an initial training platform for plain writing. To ensure the material is drafted



in plain language, staff who do not specialize in the topic area review all training documents and presentations.

The Office of Ethics Counsel (OEC) works diligently to apply the principles of the Plain Writing Act in OEC written communication both internal and external to the agency. Staff is encouraged to follow the *Communications Manual* in all written products. Additionally, OEC uses a robust peer review and supervisory review for any written products that will be broadly disseminated. On occasion, OEC also seeks input from subject matter experts at other federal agencies to eliminate ambiguity and increase consistency government-wide on common topics. As an office that was established in 2021, the bulk of the written communication has been focused on individual employee advice, guidance documents, and training for current or former employees. In the last quarter of 2021, OEC established an [external facing webpage](#) in compliance with the Plain Writing Act to summarize the functions of the office and provide the public with contact information.

Office of External Affairs and Communications (OEAC) produces press releases, manages the Section 508 compliance program, and creates social media and website postings for the agency that follow plain writing principles. OEAC also generally reviews all agency communications issued to credit unions and the public to ensure plain writing, including articles, documents, and reports. Examples of agency reports reviewed and edited by OEAC staff to ensure adherence to plain writing requirements include: the NCUA's [2021 Annual Report](#), the [2021 Congressional Report on Notification and Federal Employee Antidiscrimination and Retaliation Act \(No Fear Act\) Report](#), and the [2021 Office of Minority and Women Inclusion \(OMWI\) Report to Congress](#).

The Office of the Executive Director (OED) conducts enhanced reviews of internal and external correspondence in partnership with OEAC and the NCUA Chairman's office. OED staff, OED management, the Executive Director, and OEAC management, review these communications for content and quality before they are widely disseminated, and ensure they are properly vetted with agency subject matter experts for conformity with agency communication policies.

The Office of General Counsel (OGC) implements principles of the Plain Writing Act in its reviews of other offices' written communications as well as in its own written communications. Attorneys and staff produce large amounts of written product and regularly have peers review their work. After peer-level review, several managers review all regulations and legal opinions for consistency, accuracy, and readability. Although regulations are not considered covered documents under the Plain Writing Act (regulation preambles are), OGC emphasizes the need for plain writing and strives to make certain that regulations are plainly written and understandable. OGC attorneys often perform peer reviews of draft work product, including regulations and legal opinions, and continuously seek to reduce the use of legal jargon in written work



products. For example, the office's attorneys were actively involved with the agency's consolidation of and revisions to the [National Supervision Policy Manual](#), which included writing responsibilities and a final review of the documents for consistency, accuracy, and readability.

OHR generates numerous communications relevant to the full range of human resources and human capital programs, including topics such as employee engagement, student intern programs, training and development programs, benefits, wellness, compensation, performance management, and pandemic-related updates to leave and other key programs. For example:

- The office developed guides and special presentations to assist agency employees in understanding the hiring process and requirements to successfully apply for positions. These tools simplify the online application process, map out various parts of a vacancy announcement, and clarify terminology and verbiage used in the federal recruitment processes.
- During the pandemic, the office revised the Leave Payout Process and COVID-19 Leave Options in compliance with the Plain Writing Act and the *Communications Manual*.
- The office provides online [summary results](#) for the annual Federal Employee Viewpoint Survey written in a concise, chronological order that provides short paragraphs and bulleted information on survey results.

During the past year, the Office of Inspector General (OIG) continued to follow the Act's requirements when reviewing and revising covered documents in their draft and final form. The OIG incorporated the principles of plain writing by ensuring that audit and investigative reports were as succinct and clear as possible. The office routinely referred to the *Communications Manual* regarding agency standards and best writing practices, including limiting the number of acronyms in its work products or including an acronym definitions page in the report. The office consistently produced publications that were well-organized, clearly written, concise, and reflected strong analysis. In addition, the office updated its [website](#) and other electronic products to ensure they were clear and understandable, including the information on the [OIG Hotline complaint website](#).

The Office of Minority and Women Inclusion (OMWI) Diversity and Inclusion Communications Specialist is responsible for preparing and reviewing all communications developed by the office. Through an established editing and review process, the specialist ensures compliance with the Plain Writing Act and improves the clarity and effectiveness of all external communications. The office's Communications Specialist also works individually with staff to provide informal training on Plain



Writing Act principles. This feedback and guidance contribute to ongoing improvements in the quality of written communications from the office.

The Office of National Examinations and Supervision (ONES) emphasizes plain writing skills with its staff. ONES' document creation and review procedures include using spell and grammar checks for all documents and correcting the use of passive voice. These editing procedures, along with ensuring 508 compliance, apply to all documents posted to [NCUA.gov](https://www.ncua.gov).

The NCUA regional offices (Eastern, Southern, and Western Regions) maintain and update correspondence templates in compliance with the Plain Writing Act and the NCUA's *Communications Manual*, and review draft internal and external correspondence prepared by analysts, examiners, and other staff on multiple supervisory levels. For example:

- All correspondence is written with the Plain Writing Act in mind and staff review draft correspondence prepared by analysts on multiple levels to ensure it meets the requirements;
- Staff use agency-approved templates for correspondence and examination reports;
- Staff recommend plain writing-related revisions when asked to provide comments on instructions, regulations, and guidance documents;
- Staff receive feedback during Pre-Release Secondary Reviews and Quality Control Reviews when plain writing is not observed in examination reports;
- Feedback is provided to analysts by the Division of Supervision Director and Deputy Directors regarding compliance with the Plain Writing Act, including during staff meetings;
- Supervisors provide regular, continuous feedback to examiners and analysts on written work products with suggestions to enhance grammar and readability; and
- Performance appraisals include an evaluation of strengths and weaknesses in plain writing techniques.



## Training

---

The NCUA offices provided plain writing training to their staff and routinely incorporated discussions of plain writing principles in meetings. The items below are examples of agency training conducted and received during 2021–2022.

- CURE updated credit union board education training video modules, available in the [Learning And Managing Performance](#) service, on topics relevant to credit union board members including meeting best practices, succession planning, mergers, and the agency’s new Modern Examination and Risk Identification Tool.
- Despite the ongoing remote work posture during the pandemic, the Office of Examination and Insurance Technical Editors continue to provide one-on-one training for staff. New employees and detailees receive individual training sessions with a Technical Editor to learn about the agency’s plain writing standards and how to create successful written products. All material and significant documents undergo technical editing review before submission to leadership, and E&I Editors use the editing process to explain and educate authors about plain language. The E&I Technical Editors also created an e-mail distribution list for disseminating plain writing tips for improving writing to staff. These tips are archived and available to agency staff. Recent topics include:
  - Word usage (Affect | Effect | Impact);
  - Deliberate usage of modifiers;
  - Positive phrasing for clarity;
  - Direct phrasing;
  - The serial comma; and
  - Guidance for when to use acronyms.
- OBI encourages all staff to periodically attend webinars and other training addressing plain writing skills. Also, OBI ensures all user guides and training materials on examination modernization are reviewed and updated before dissemination to users and posted online. One example of training is the [NCUA’s Modernized Examination Tools](#) webinar.
- OCIO encourages staff to attend training focused on communication and plain writing.
- OGC provides all attorneys access to on-demand training through the West Legal Education Center website that includes many courses on clear and concise



writing. The variety of course offerings allow each attorney, in consultation with their supervisor, to select the writing course work most relevant for their practice area and training needs. Attorneys are also encouraged to engage in outside training courses offered through various bar associations or legal training centers.

- OHR develops and sponsors numerous plain writing classes for all NCUA staff, including a virtual plain writing course for examiners as part of new examiner curriculum and online training on the Plain Writing Act. Examples include:
  - Ten sessions of a one-day *Plain Writing* course for new NCUA examiners as part of the training in communications (63 Federal employees and 37 State employee trainees attended);
  - Two sessions of a two-day *Writing for Examiners* workshop for experienced examiners who need a refresher on plain writing principles (24 Federal employee trainees attended); and
  - *Plain Writing Act* online training for all new NCUA employees (111 Federal employee trainees attended this past year).
- This year, OIG revised OIG training for all agency employees. Also, all OIG employees complete plain writing training, and management encourages employees to include a periodic plain writing refresher course in their continuing professional education plan. To the extent any instances of non-compliance with the Plain Writing Act are identified, the responsible manager discusses such instances with the employee, provides further training opportunities, and takes other actions as needed to ensure compliance.
- OMWI's Diversity and Inclusion Communications Specialist works individually with staff to provide informal training on plain writing principles, contributing to ongoing improvements in the quality of written communications from the OMWI office.
- ONES staff completed report writing training sessions at staff meetings. The trainings emphasized using plain writing, writing in active voice, using simplified sentences, and making information easier to read using headers and bullets.
- The Regions conduct periodic training for examiners on the Plain Writing Act and encourage staff to attend online training modules available in the [Learning And Managing Performance](#) service and other classes to enhance plain writing skills, such as:
  - The Plain Writing Act;
  - Audience and Purpose in Business Writing;
  - Clarity and Conciseness in Business Writing;



- Creating Well-constructed Sentences;
  - Editing and Proofreading Business Documents;
  - Improving Your Technical Writing Skills;
  - Troublesome Words and Phrases: Common Usage Mistakes in Writing;
  - Using the Parts of Speech;
  - Communications;
  - Effective Writing for Examiners; and
  - Effective Writing for Office Staff.
- A monthly Plain Writing tip is sent to staff in the Eastern Region, including such items as:
    - References to Chapters 2 and 14 in the *Communications Manual*: when you join more than one independent clause together, you need either a comma and a conjunction or a semi-colon. For example: Delinquency increased, and loan quality declined;
    - References to Chapter 14 in the *Communications Manual*: capitalize proper nouns. Proper nouns include someone's name and the full name of an organization or part of an organization. But don't capitalize common (general) words describing an organization or part of an organization; and
    - Write to communicate, to be understood, but not to impress.

While the NCUA strived to improve communications during the reporting year, the agency recognizes that more can still be accomplished. In that regard, OEAC is currently updating the agency's *Style Guide*, formerly the *NCUA Communications Manual*. The agency will continue to conduct plain writing training, as well as review other internal processes and templates, to further improve performance in plain writing in the year ahead.